UNITED STATES DISTRICT COURT SOUTHERN DISTRICT OF NEW YORK

IN RE WORLD TRADE CENTER DISASTER SITE LITIGATION

21 MC 102 (AKH)

TADEUSZ KOWALEWSKI AND BEATA KOWALWESKI,

DOCKET NO. 06-CV-01521-AKH

Plaintiff(s),

NOTICE OF DEPOSITION UPON ORAL EXAMINATION

1.1

v.

DEUTSCHE BANK TRUST COMPANY AMERICAS, et al.,

Defendants.

PLEASE TAKE NOTICE, that pursuant to Fed. R. Civ. P. 30, the Defendants' Liaison Counsel and Defendants will conduct a deposition upon oral examination of Dr. Lori Spechler-Sidman, M.D., for plaintiff Tadeusz Kowalewski ("Plaintiff") in the above-captioned lawsuit, before a notary public or other officer authorized by law to administer oaths, at 9:30 a.m. on the 29th day of January, 2014, at Day Pitney LLP, 7 Times Square, New York, New York 10036, and on any adjourned date thereof, and from day to day thereafter until completed. You are invited to attend and cross-examine; and

PLEASE TAKE FURTHER NOTICE, that pursuant to Fed. R. Civ. P. 34, Defendants have requested that Dr. Spechler-Sidman produce for inspection and copying all documents and things in response to the requests set forth in the subpoena and accompanying Exhibit "A" attached hereto at a time and place mutually agreeable to counsel prior to the depositions; and

PLEASE TAKE FURTHER NOTICE that the deposition may be videotaped.

Dated: New York, New York January 28, 2014

DAY PITNEY LLP

By:

Barbara M. Yu Associate

7 Times Square New York, New York 10036 (212) 297-5841

On behalf of the Defense Liaison Committee for Defendants in the 21 MC 102 and 21 MC 103 Dockets and as Attorneys for Defendant Deutsche Bank Trust Company Americas Deutsche Bank Trust Corporation DB Private Clients Corporation DBAB Wall Street LLC

TO: Gregory J. Cannata and Robert A. Grochow Gregory J. Cannata and Associates 233 Broadway, 5th Floor New York, New York 10279

CERTIFICATE OF SERVICE

I hereby certify that on January 28, 2014, I caused the within Notice of Deposition Upon Oral Examination to be electronically served to all counsel via ECF and additionally by United States Mail upon the following counsel:

Gregory J. Cannata and Robert A. Grochow Gregory J. Cannata and Associates 233 Broadway, 5th Floor New York, New York 10279

DAY PITNEY LLP

Baybara M. Yu

Associate

7 Times Square New York, New York 10036 (212) 297-5800

On behalf of the Defense Liaison Committee for Defendants in the 21 MC 102 and 21 MC 103 Dockets and as Attorneys for Defendant Deutsche Bank Trust Company Americas Deutsche Bank Trust Corporation DB Private Clients Corporation DBAB Wall Street LLC